

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

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| <p>UNITED STATES OF AMERICA,<br/>vs.<br/>NOE SALINAS-RAMIREZ,</p> <p>Plaintiff,<br/>Defendant.</p> | <p>Cr. No. 3:25-cr-61</p> <p><b>DEFENDANT'S MOTION TO<br/>CONTINUE TRIAL</b></p> |
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Comes now Noe Salinas-Ramirez, by and through his attorney, Assistant Federal Public Defender Charles J. Sheeley, and moves the Court for its Order extending the trial setting of June 3, 2025, as well as all related pretrial deadlines.

As grounds, Defendant states:

1. Defendant made his initial appearance on February 28, 2025, and was arraigned on April 1, 2025, on an Indictment, charging the Defendant with Reentry of Deported Alien, in violation of 18 U.S.C. § 1326(a).
2. The Court entered its Criminal Pretrial Order and Jury Trial Notice on April 1, 2025, setting the jury trial for June 3, 2025.
3. Defendant received initial discovery from the government on March 7, 2025. Discovery receipt is ongoing.
4. Defense counsel needs additional time to properly investigate this matter and prepare for trial. Additional time is needed to coordinate with Mr. Salinas-Ramirez's immigration attorney before defense counsel can competently advise the Defendant if a plea agreement or trial is in his best interests.

5. Defense counsel has advised the Defendant of this motion, its purpose, and constitutional and statutory right to a speedy trial, pursuant to 18 U.S.C. § 3161 et seq. Defendant said he would consent to a continuance and has executed a written consent form, which is being filed contemporaneously with this motion.

6. Defendant is currently detained at the Kandiyohi County Jail in Willmar, Minnesota.

7. The Government, through Assistant United States Attorney Alexander Stock, does not object to this motion.

8. The undersigned, further, represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the Defendant in order to have the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

WHEREFORE, Defendant Noe Salinas-Ramirez, requests that the Court continue the trial setting to a time past June 3, 2025, and further, that all related pretrial deadlines be continued.

Dated this 30th day of April, 2025.

Respectfully submitted,

JASON J. TUPMAN  
Federal Public Defender  
By:

/s/ Charles J. Sheeley  
Charles J. Sheeley  
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